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January 14, 2025

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of the Kingdom of Saudi Arabia (“Saudi Arabia”) concerning a sealed filing made by Saudi Arabia today. Today’s filing is a letter-motion to strike three Plaintiffs’ experts (Lawrence Dunham, Evan Kohlmann, and Steven Simon), based on the Court’s December 11, 2024 Order on the parties’ *Daubert* motions. Saudi Arabia is filing the letter-motion and the exhibits to the same under seal subject to the FBI’s review because they cite filings that are currently sealed under the FBI Protective Order. *See* ECF No. 4255.

Saudi Arabia is making today’s filing under seal using the Court’s sealed ECF procedures. Copies of Saudi Arabia’s filing and accompanying exhibits are being sent today by email to counsel for Plaintiffs, Dallah Avco, and the FBI. No courtesy copies of this letter or today’s sealed filing are being sent to Your Honor’s chambers, in accordance with our understanding that courtesy copies of letter-motions are not required. Moreover, no courtesy copies of this letter or today’s sealed filing are being sent to the chambers of Judge Daniels, in accordance with the current version of his Individual Practices.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)